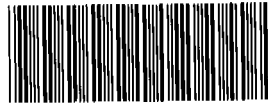


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96-RM-TA-0127-KH

June 17, 1996

Karan North, Division Manager
Compliance and Performance Assurance
Building T130C
Kaiser-Hill Company, L.L.C.

Subject: SUBMITTAL OF PART VIII OF THE RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) PART B PERMIT REAPPLICATION - CCJ-169-96

Action: Transmit to the United States Department of Energy, Rocky Flats Field Office (DOE, RFFO) for submittal to the Colorado Department of Public Health and Environment (CDPHE)

Rocky Mountain Remediation Services, L.L.C. (RMRS) is submitting the final version of Part VIII (Contingency Plan) of the RCRA Part B Permit reapplication to the Kaiser-Hill Company, L.L.C. (Kaiser-Hill) for transmittal to DOE, RFFO. The draft of this section, which was submitted to Kaiser-Hill on May 29, 1996, has been modified to incorporate comments received from both Kaiser-Hill and DOE, RFFO.

RMRS is requesting that Part VIII be transmitted to DOE, RFFO for submittal to CDPHE as part of the RCRA Part B Permit reapplication.

RMRS is pleased to have provided this service to Kaiser-Hill. If you have any questions concerning this section or the reapplication process, please contact Bob Shanks at extension 5512.

A handwritten signature in cursive script, appearing to read "Candice C. Jierree".

Candice C. Jierree
Technical Assurance, RMRS

Attachments:

- 1 Draft letter to DOE
- 2 Draft letter to CDPHE
- 3 Final draft of Part VIII of the RCRA Part B Permit reapplication

cc: (w/ attachments)

R. M. Leitner Kaiser-Hill (T130C)
R. Bloom SSOC (750)
R. W. Shanks RMRS (T130C)
G. R. Sollner Kaiser-Hill (T130D)
K. W. Ticknor RMRS (T130C)
RMRS Records Center (080)
File RMRS (T130F)

cc: (w/out attachments)

C. Dayton Kaiser-Hill (T130C)
E. J. Poling RMRS (T130B)
K. A. Holstein DCI (T130D)
G. R. Konwinski RMRS (T130F)

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ADMIN RECCRD

1A-A-000719



DRAFT

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DRAFT

Attachment 1
96-RM-TA-0127-KH
Page 1 of 1

Steven Tower, Group Lead
Environmental Assessment Group
United States Department of Energy, Rocky Flats Field Office (DOE, RFFO)

Attn: Dave Grosek

**SUBMITTAL OF PART VIII OF RESOURCE CONSERVATION AND RECOVERY ACT
(RCRA) PART B PERMIT REAPPLICATION**

The Kaiser-Hill Company, L.L.C. (Kaiser-Hill) is submitting the final version of Part VIII (Contingency Plan) of the RCRA Part B Permit reapplication to DOE, RFFO. Kaiser-Hill is requesting that Part VIII be transmitted to the Colorado Department of Public Health and Environment (CDPHE) as part of the RCRA Part B Permit reapplication. This section of the revised permit is due to CDPHE by June 26, 1996.

If you have any questions concerning these sections or the reapplication process, please contact Randy Leitner at extension 3537.

Karan North, Division Manager
Compliance & Performance Assurance

Orig. and 1 cc - Steven Tower

Attachments:

- | | |
|---|--|
| 1 | Draft letter to CDPHE |
| 2 | Draft of Part VIII of the RCRA Part B Permit reapplication |

cc:

R. DiSalvo	DOE, RFFO
D. Maxwell	DOE, RFFO
R. Leitner	Kaiser-Hill
R. Shanks	RMRS

DRAFT

DRAFT

DRAFT

Attachment 2
96-RM-TA-0127-KH
Page 1 of 1

Mr. Joe Schieffelin, Unit Leader
Hazardous Waste Control Program
Colorado Department of Public Health and Environment
4300 Cherry Creek Drive South
Denver, Colorado 80222-1530

Dear Mr. Schieffelin:

The United States Department of Energy, Rocky Flats Field Office (DOE) is submitting the enclosed section of the Resource Conservation and Recovery Act (RCRA) Part B Permit reapplication. This transmittal includes the final draft version of Part VIII (Contingency Plan). This section is being submitted as part of the rolling submittal of the Rocky Flats Environmental Technology Site RCRA Part B Permit reapplication.

This section has been developed by a team of individuals representing the co-operators of the Site and is intended to address both the current and future needs of the Site. As you or your staff review this section of the permit reapplication, please note that we are available to discuss any issues which arise concerning its content or the rationale used to develop it.

If you have any questions concerning these sections of the permit reapplication, please contact David Maxwell at 966-4017.

Sincerely,

Bob April, Group Lead
Environmental Liason Group

Attachment:

1 Final draft version of Part VIII of the RCRA Part B Permit reapplication

cc:

R. Disalvo	DOE, RFFO
D. Grosek	DOE, RFFO
D. Maxwell	DOE, RFFO
R. M. Leitner	Kaiser-Hill
R. W. Shanks	RMRS



**RESOURCE CONSERVATION AND
RECOVERY ACT PART B PERMIT
APPLICATION**

PART VIII - CONTINGENCY PLAN



PART VIII - CONTINGENCY PLAN

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PART VIII - CONTINGENCY PLAN

FOR ACTIONS REQUIRED IN THE EVENT OF A HAZARDOUS WASTE INCIDENT, GO DIRECTLY TO SECTION D.

A. PURPOSE

This document outlines the actions to be taken to minimize hazards to human health and the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, surface or ground water at the Rocky Flats Environmental Technology Site (Site). The Contingency Plan outlines the procedures to be followed in the event of an incident which could endanger human health or the environment.

B. INCIDENT CATEGORIZATION AND INITIAL RESPONSE

Incidents at the Site are categorized based on the extent of the incident, the threat posed to human health and the environment, and the resources necessary to mitigate and remediate it. The initial categorization of an incident occurs at the building/area level. When discovered, an incident is reported to building/area management. If building/area management is not available, the incident may be reported to the Shift Superintendent (SS) or to emergency personnel through the Site emergency phone number (X2911). Building/area management categorizes the occurrence, notifies the SS (all occurrences), implements the Building Emergency Response Operations Procedure and Implementing Instructions (BERO), as appropriate, and directs protective actions for building/area occupants (if applicable).

When notified of the incident and the initial categorization, the SS responds only if the incident has been categorized as an "operational emergency." Operational emergencies are subcategorized as either an "Alert," a "Site Area Emergency," or a "General Emergency." These levels of an operational emergency have the following characteristics:

1. Alert: Events are in progress or have occurred which involve an actual or potential substantial degradation of the level of safety of the facility which includes actual or potential substantial degradation in the level of protection of the facility. Any release of hazardous materials (radiological or non-radiological) is expected to be limited to small fractions of the appropriate Protective Action Guide (PAG) or Emergency Response Planning Guidelines (ERPG) exposure levels. Declaration of an ALERT activates the Emergency Operations Center (EOC) and ensures notifications to on-site, off-site, and the Department of Energy (DOE) personnel. Resources are made available for response if the situation becomes more serious.
2. Site Area Emergency: Events are in progress or have occurred which involve actual or likely major failures of facility functions needed for protection of workers and the public, and/or actual malevolent acts resulting in major failure of protective systems. Releases of hazardous materials (radiological or non-radiological) are expected to exceed appropriate PAG and ERPG exposure levels onsite but is not expected to exceed the appropriate PAGs or ERPGs off-site.
3. General Emergency: Events are in progress or have occurred which involve actual or imminent catastrophic reduction of facility safety systems with potential loss of containment or confinement integrity (e.g., release of large quantities of hazardous materials to the environment) or release of hazardous materials (radiological or non-radiological) that can reasonably be expected to exceed appropriate PAG or ERPG

exposure levels off-site, and/or when events are in progress or have occurred which involve malevolent action resulting in catastrophic degradation of protective systems that could lead to substantial off-site impacts.

If the incident is not categorized as an operational emergency, it is handled at the building level. All of these activities are conducted in accordance with approved Site procedures. The remainder of the Contingency Plan identifies in greater detail all aspects of Site response activities and responsibilities.

C. PLAN IMPLEMENTATION

This Contingency Plan defines which types of incidents must be mitigated by the Site Fire Department and HazMat Unit and those which may be remedied by area personnel.

The determination of the categorization of the incident is the responsibility of the area personnel and/or the Shift Superintendent (Site Emergency Coordinator) as described previously. In the event an incident is categorized as an "operational emergency," response actions are conducted in accordance with the Site Emergency Plan (EPLAN) which incorporates contingency plan requirements. The EPLAN is the governing document for emergency response actions at the Site and is maintained by the Emergency Preparedness organization at the Site.

As identified in this Contingency Plan, only Levels 3 and 4 hazardous waste incidents result in the implementation of the emergency procedures in this Contingency Plan and subsequent reporting. However, recategorization of an incident following the completion of response activities may require follow-up notifications based on the evaluation of all relevant information gathered about the incident. For all other incidents, actions will be initiated in accordance with site policies and/or procedures for non-emergency response including, but not limited to, BEROs, Section 4 of the Hazardous Waste Requirements Manual or Section 21.04 of the Health and Safety Practices Manual.

The following provides a description of the four categories of incidents for the Site.

1. Level 1 incident (non-emergency):

This type of incident includes, but is not limited to:

- a. a minor hazardous or mixed waste release within a building, structure, or area that does not threaten human health or the environment, as determined by the Site EC;
- b. a hazardous or mixed waste incident resulting in personal injury requiring only minor first-aid treatment; or
- c. other unplanned sudden or non-sudden release of hazardous or mixed waste which does not threaten human health or the environment.

A Level 1 incident requires timely response of workers assigned to the affected area (incidental response) for mitigation and clean-up; emergency units and personnel external to the area in which the incident occurs are not involved in response to this type incident. Acceptable personal protective equipment (PPE) for responding to a Level 1 incident is normal work area clothing and equipment. Area personnel respond to these incidents with equipment that is present within the area in accordance with area-specific procedures and direction from area supervision.

If additional non-routine PPE or response measures are necessary, the incident shall be reclassified to a higher level incident.

The emergency procedures outlined in this Contingency Plan are not performed for a Level 1 incident. Response to Level 1 incidents are governed by the applicable BERO as a non-emergency incident requiring incidental response actions.

2. Level 2 incident (non-emergency):

This type of incident includes, but is not limited to:

- a. a small to moderate hazardous or mixed waste release which is contained within a building or a release outside of a building that does not threaten human health or the environment, as determined by the Site EC;
- b. a hazardous or mixed waste incident resulting in a single, small fire that is contained and extinguished by building personnel or the Fire Department that will not result in the release of hazardous or mixed waste that could threaten human health or the environment; or
- c. a hazardous or mixed waste incident resulting in injuries requiring out-patient medical treatment.

A Level 2 incident requires the timely response of the Site Hazardous Materials (HazMat) Team or Fire Department. A Level 2 incident requiring the response of the HazMat team would typically require Level D or Level C PPE. The need for Level C PPE would be precautionary and would be necessitated by the presence of irritants in the immediate incident area, but would not include any hazards that could significantly threaten human health or the environment.

The categorization of any fire involved in the incident relative to the description in 2.b of this section will be done at the time of response by the Fire Department. Initial response by the Fire Department is carried out consistently for all confirmed fires; all responses are conducted at the highest level of readiness. When the Fire Department arrives on-scene, the fire, if still burning, is extinguished. Categorizing the fire will be a judgement decision of the Fire Department based on the time needed to extinguish the fire and the degree of damage caused by the fire. If it is determined that an incident has been miscategorized after the fact, the incident will be recategorized and appropriate notifications and reports will be submitted in accordance with this Contingency Plan.

The emergency procedures outlined in this Contingency Plan are not performed for a Level 2 incident. Response to Level 2 incidents are governed by the applicable BERO as a non-emergency incident requiring incidental response actions, or in accordance with guidance provided by building/area management or the Shift Superintendent.

3. Level 3 incident (emergency):

This type of incident may include, but is not limited to:

- a. a major hazardous, or mixed waste release that results in a possible threat to human health or the environment;
- b. a hazardous or mixed waste incident resulting in a major fire or explosion that is controlled; or

- c. a hazardous or mixed waste incident resulting in an injury requiring hospitalization.

A Level 3 incident affects only one building or building complex and requires emergency response by the Site HazMat Team or Fire Department for mitigation and remediation.

Implementation of the EPLAN may occur for a Level 3 incident at either the "Alert" or "Site Area Emergency" level. Requirements for response to these types of incidents are undertaken, as necessary. The Contingency Plan is also implemented for these incidents.

4. Level 4 incident (major emergency):

This type incident may include, but is not limited to:

- a. a hazardous or mixed waste incident resulting in a major uncontrolled fire or explosion;
- b. the release of significant quantities of hazardous or mixed waste; or
- c. other situations which result in actual or possible danger to Site workers and areas surrounding the Site

The EPLAN, at the "Site Area Emergency" or General Emergency" level, will be implemented and the emergency procedures outlined in this Contingency Plan will be performed for these incidents.

D. EMERGENCY PLANS

The document which governs overall emergency response activities at the Site is the EPLAN. It establishes the preparedness and response actions that must be implemented in the event of a declared emergency. The EPLAN provides an overview of the Site Emergency Response Organization and the roles and responsibilities of its members to develop, prepare, implement and maintain the capability to respond to and mitigate the effects of hazards associated with emergencies; to direct protective actions for workers and Site visitors; to notify off-site officials and provide protective action recommendations to protect the public; to limit adverse impacts to the environment; and to use the "as low as reasonably achievable" principle for hazard exposure limits for workers responding to the emergency.

At the building level, response actions are conducted in accordance with BEROs which identify specific emergency response actions to be performed during an emergency or abnormal event within a building. The Contingency Plan will be utilized in conjunction with existing policies and procedures as well as BEROs and the EPLAN, as necessary, to ensure that emergencies are mitigated and hazardous waste management requirements are incorporated into emergency response actions. Emergency response personnel are identified below, as well as their duties and responsibilities.

E. EMERGENCY COORDINATORS

At the Site, a Shift Superintendent is on duty at all times and acts as the Emergency Coordinator (EC). In the event of an emergency incident, the EC is responsible for the implementation and coordination of the Contingency Plan. The EC is responsible for the initiation of sitewide response to emergencies and may also function in a similar capacity under the Site EPLAN.

In the event of an Operational Emergency as defined in the Site EPLAN, the EC is required to assume the role of the Incident Commander (IC). In these capacities, the EC has full authority to expend all available Site resources and those discussed in Section II of this part to mitigate any emergency situation.

Per Site procedures, the EC receives notification of all incidents at the Site. The EC utilizes incident descriptions (Level 1 through 4), professional judgement, and input from personnel in the affected area to determine when a threat to human health or the environment exists as a result of an incident. For those incidents judged to pose a threat to human health or the environment, the emergency procedures of the Contingency Plan will be implemented. Only the EC may implement the emergency procedures of the Contingency Plan.

All other actions outlined in the Contingency Plan may be performed by others (e.g., Crisis Manager, Senior Fire Protection Officer, Senior Security Officer) as delineated in the Site EPLAN and/or other Site policies, procedures, and plans, as appropriate. However, it remains the responsibility of the EC to ensure that the emergency procedures outlined in the Contingency Plan are completed.

In the event of an emergency, it is up to the Site EC to determine whether the Emergency Operations Center (EOC) will be activated. The EOC is staffed by teams of individuals from various disciplines at the Site who are assembled in time of emergency to evaluate an incident from their varied perspectives and ensure that response to an emergency incident is properly evaluated, coordinated, and implemented. In the event of an emergency, the Site EPLAN will be used to manage the activities of those charged with guiding the response measures. Periodic drills at the Site are conducted to ensure prompt and appropriate response actions are conducted. The regulatory requirements of the Contingency Plan are incorporated in response activities conducted according to the EPLAN.

In the event of an emergency, the Site EC can be contacted by dialing (303) 966-2911 (the Site emergency telephone number), or contacted directly by dialing (303) 966-2914. Additionally, Site personnel are trained to alert emergency personnel by lifting the receiver of a fire phone and leaving it off the hook. This alerts the fire department of an incident and its location automatically. In this manner, personnel unable to call the SS directly can notify emergency personnel of an incident requiring response without remaining in the area of the incident.

F. EMERGENCY PROCEDURES

In the event of an incident, the personnel listed below have the following responsibilities:

1. Emergency Coordinator (EC)

Upon categorization of a reported incident as a Level 3 or 4 incident, the EC will ensure that the following actions are completed in accordance with existing Site policies, procedures, and plans, as appropriate:

- a. activate internal Site alarms or communication systems, where applicable, to notify affected Site personnel of the emergency;
- b. notify appropriate State and local agencies of the emergency;
- c. identify the character, exact source, amount, and areal extent of any released materials utilizing observation, process knowledge, records review or chemical analysis;

- d. assess possible hazards to human health or the environment that may result from the incident including indirect effects of the release, fire, or explosion;
- e. determine whether the incident could threaten human health or the environment outside the Site;
- f. immediately notify appropriate local authorities if evacuation of local areas is advisable;
- g. immediately notify the National Response Center (NRC) at 1-800-424-8802 if human health or the environment outside the Site is threatened and report the following:
 - i. name and telephone number of reporter;
 - ii. name and address of Site;
 - iii. time and type of incident;
 - iv. name and quantity of material(s) involved, to the extent known;
 - v. the extent of injuries, if any; and
 - vi. the possible hazards to human health or the environment, outside the Site.
- h. Take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste at the Site. These measures must include, where applicable, stopping processes and operations, collecting and containing released waste, and removing or isolating any containers threatened by the incident or impeding response activities.
- i. If hazardous waste operations at the Site are stopped in response to a fire, explosion, or release, then monitor for leaks, pressure buildup, gas generation, or rupture in valves, pipes, or other equipment as appropriate.
- j. Immediately provide for the treatment, storage, or disposal of recovered waste, contaminated soil or surface water or any other material that resulted from the incident.
- k. Ensure that, in the affected area(s) of the Site:
 - i. No waste that may be incompatible with the released material is treated, stored, or disposed of until cleanup procedures are completed;
 - ii. Emergency equipment is cleaned and fit for its intended use before hazardous waste operations are resumed.

2. Responsible Manager

Responsibilities of the manager of the affected area include the following:

- a. Notify the Colorado Department of Public Health and Environment, that the Site is in compliance with Part VIII.F(1)(k) before operations are resumed in the affected area(s) of the Site.
- b. Note in the operating record the time, date, and details of the incident.
- c. Within 15 days, submit a written report on the incident to the Division. The report must include:
 - i. name, address, and telephone number of the owner, operator, or co-operator;
 - ii. name, address, and telephone number of the Site;
 - iii. date, time, and type of incident (e.g., fire, explosion);
 - iv. name and quantity of material(s) involved;
 - v. the extent of injuries, if any;
 - vi. an assessment of actual or potential hazards to human health or the environment, where applicable; and
 - vii. estimated quantity and disposition of recovered material that resulted from the incident.

G. EVACUATION PLAN

Evacuations of buildings or areas at the Site are conducted in accordance with applicable BEROs or instructions provided by building or area management. Site personnel are provided with facility-specific training regarding evacuation notification, primary and alternate evacuation routes, facility hazards, and assembly areas. Maps detailing both primary and alternate evacuation routes are posted at entrances to each building or area. Drills are conducted periodically to ensure Site personnel are familiar with the evacuation routes.

In the unlikely event emergency conditions warrant the evacuation of the entire Site, the evacuation will be carried out in accordance with the Winter Storm Contingency/Interim Site Evacuation procedure which is maintained by the Emergency Preparedness organization. Site personnel will be notified via the Life Safety/Disaster Warning (LS/DW) system, two-way radios, and/or the internal telephone system and provided with information regarding best routes and methods of transportation for conducting the evacuation.

H. COORDINATED EMERGENCY SERVICES

Coordinated emergency services support is established through formal Memoranda of Understanding (MOU) and Mutual Aid Agreements (MAA) with the following:

- Medical: University of Colorado Health Sciences Center (MOU), St. Anthony Hospitals (MOU)

- Fire support: Jefferson County HAZMAT Authority (MAA), Coal Creek Fire District (MAA), Westminster Fire and Rescue (MAA)
- Security: Colorado State Patrol (MOU), Jefferson County Sheriff (MOU), Federal Bureau of Investigation (MOU)
- Alternate Emergency Operations Center: Federal Emergency Management Agency, Region VIII (MOU)

These agreements undergo an annual review, and are normally effective for a period of five years or as modified earlier by request of either signatory. The Mutual Aid Agreements and Medical MOUs contain provisions for the availability of ambulance and Flight-for-Life support. Copies of these formal agreements are appended to the Site EPLAN. Activities related to joint emergency response planning are facilitated through the Joint Planning Team, conducted under the direction of the Colorado Department of Public Health and Environment, Emergency Management Program.

I. EMERGENCY EQUIPMENT

The emergency equipment available at the Site, at a minimum, meets the requirements of 6 CCR 1007-3, Section 264.32 and 265.32. A description of the emergency equipment follows:

1. Fire Control Equipment

The Site operates a fully staffed fire department for on-site emergency response. The majority of the Site's fire fighting equipment is located at the on-site Fire Department (Building 331). A listing of all fire control equipment, including location and capability, is maintained by the Fire Protection Engineering and Fire and Emergency Services organizations and is updated regularly. This information is available for review at all times.

2. Spill Response Equipment

Spill control equipment is maintained by the Fire Department HazMat unit. Details on the Fire Department's hazardous materials response program are contained in Site Fire Department standard operating procedures. A listing of the Department's spill control equipment is maintained by the Fire and Emergency Services organization and is available for review at all times. In addition, all areas where hazardous waste is generated, accumulated, stored, or treated have adequate spill control equipment and/or supplies available to respond to a Level 1 release. A list of the spill response materials accessible to each unit is maintained at or near the waste management unit.

3. Decontamination Equipment

Decontamination facilities are located in various buildings at the Site including the following: Buildings 122, 371, 707, 771, 776/777, 779, and 881. The decontamination facilities are maintained with monitoring equipment, showers, and decontamination materials. Eyewash stations and safety showers are located throughout the Site. In addition, the HazMat van and trailer are equipped with decontamination pools.

Site personnel are provided with Site- and facility-specific training to identify the locations of emergency equipment, for proper response to incidents and alarms, and incident reporting requirements. This training is conducted when personnel are assigned to a new or different area of the Site and regularly thereafter during the assignment.